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January 7, 2025

VIA ECF

Hon. Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Freeman et al. v. Giuliani, No. 24-cv-6563 (LJL); No. 24-mc-353 (LJL)¹

Dear Judge Liman:

Pursuant to Paragraph 2(H) of the Court's Individual Rules and Practices, and Paragraph 4(b) of Attachment A thereto, Plaintiffs Ruby Freeman and Wandrea' Moss respectfully submit this letter-motion for leave to file their Proposed Findings of Fact and Conclusions of Law in the above-captioned cases with redactions, with unredacted copies filed under seal.

Pursuant to Paragraph 4(b) of Attachment A, Plaintiffs state that Defendant Rudolph W. Giuliani possesses the confidentiality interests in the information sought to be redacted, and respectfully request that the Court not rule on this letter-motion for one week.

Plaintiffs note that some of the material sought to be redacted was produced by Mazars USA, LLP, subject to a protective order, which requires that any such material be filed pursuant to Paragraph 2(H) of the Court's Individual Rules. *See* ECF No. 95-2, at 5 ¶ 8.² Other material was not produced by Mazars USA, LLP, and is not subject to a protective order, but Plaintiffs are nonetheless filing it pursuant to Paragraph 2(H) out of an abundance of caution.

Respectfully submitted,

s/ Aaron E. Nathan

¹ Unless otherwise noted, all docket references herein refer to No. 24-mc-353 (LJL).

² In granting leave to serve a subpoena on Mazars USA, LLP, the Court stated that it would sign "the proposed protective order," ECF No. 97, but it appears that the signed protective order has not been entered on the docket. Nonetheless, and subject to further order of the Court, Plaintiffs are proceeding under the terms of that proposed order as though signed and entered by the Court.